

U.S. AORR (Rev. 1/94) Subpoena in a Civil Case

Issued by the
UNITED STATES DISTRICT COURT

DISTRICT OF
MASSACHUSETTS

SHAWN DRUMGOLD**SUBPOENA IN A CIVIL CASE**

V.

**TIMOTHY CALLAHAN, FRANCIS M. ROACHE,
 PAUL MURPHY, RICHARD WALSH AND
 THE CITY OF BOSTON**

Case Number:¹ **04-11193NG**

**TO: STEVEN RAPPAPORT, ESQ.
 RAPPAPORT & DELANEY
 228 CENTRAL STREET
 LOWELL, MA 01852**

☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

**BONNER, KIERNAN, TREBACH & CROCIATA, LLP
 ONE LIBERTY SQUARE 6TH FLOOR, BOSTON MA 02109**

DATE AND TIME

AUGUST 4, 2006**10:00 A.M.**

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

SEE ATTACHED SCHEDULE "A"

PLACE

DATE AND TIME

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Hugh R. Curran
HUGH R. CURRAN/ATTORNEY FOR DEFENDANT RICHARD WALSH

6/26/06

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

**HUGH R. CURRAN, ESQ./BONNER, KIERNAN, TREBACH & CROCIATA, LLP
 ONE LIBERTY SQUARE 6TH FLOOR, BOSTON MA 02109 (617) 426-3900**

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,
PLAINTIFF,

v.

TIMOTHY CALLAHAN, FRANCIS M.
ROACHE, PAUL MURPHY, RICHARD
WALSH, AND THE CITY OF BOSTON,
DEFENDANTS.

C.A. NO. 04-11193NG

RE-NOTICE OF TAKING DEPOSITION

TO: John P. Roache, Esq.
Hogan, Roache & Malone
66 Long Wharf
Boston, MA 02110

MaryJo Harris, Esq.
Morgan, Brown & Joy
200 State Street, 11th Floor
Boston, MA 02109

Michael W. Reilly, Esq.
Tommassino & Tommassino
Two Center Plaza
Boston, MA 02108-1904

Rosemary Curran Scapicchio, Esq.
Four Longfellow Place, Suite 3703
Boston, MA 02114

William White, Esq.
Davis, Robinson & White, LLP
One Faneuil Hall Marketplace
South Market Building
Boston, MA 02109

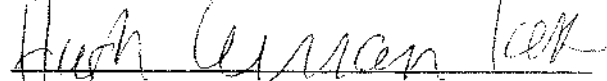
Please take notice that at 10:00 A.M. on Friday, August 4, 2006, at the law offices of **Bonner Kiernan Trebach & Crociata, LLP, One Liberty Square, Boston, Massachusetts**, the defendant, Richard Walsh, through his attorney, will take the deposition upon oral examination of **Steven Rappaport**, pursuant to the applicable provisions of the Federal Rules of Civil Procedure, before a Notary Public in and for the Commonwealth of Massachusetts, or before some other officer authorized by law to administer oaths.

The deponent is further required to bring the documents listed in the attached Schedule "A."

The oral examination will continue from day to day until completed. You are invited to attend and cross-examine.

RICHARD WALSH,

By His Attorney,

A handwritten signature in cursive script, appearing to read "Hugh R. Curran", written over a horizontal line.

Hugh R. Curran (BBO #402057)

BONNER KIERNAN TREBACH &
CROCIATA, LLP

One Liberty Square - 6th Floor

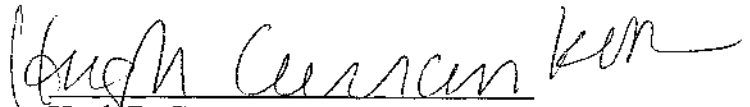
Boston, MA 02109

(617) 426-3900

DATED: June 26, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the within document was served upon the attorney of record for each other party by mail, on June 26, 2006.

A handwritten signature in cursive script, appearing to read "Hugh R. Curran", written over a horizontal line.
Hugh R. Curran

SCHEDULE "A"

INSTRUCTIONS

The term "document(s)" in the requests below shall include every writing of any nature, including every manner of letter, memorandum, note, log book, notebook, contract, agreement, lease, study, report, record, notice, minutes of meetings, program, opinion, work pad, diary, legal opinion, message, telegram, advertisement, brochure, computer print-out, computer data bank or base, computer program, invoice, billing, list, correspondence, appraisal, or other item whether written in manuscript, typewritten, printed, electronic, magnetic, or other form of recordation of any kind, and including all copies thereof bearing any writing, figures, or notation not appearing in the original.

DOCUMENTS REQUESTED

1. Any and all correspondence between Steven Rappaport and Shawn Drumgold and/or representatives of Shawn Drumgold.
2. Any and all correspondence between Steven Rappaport and any witness in the original and/or current case.
3. Any and all correspondence between Steven Rappaport and any media outlet regarding Shawn Drumgold.
4. Any all documents used in the preparation of the defense of Shawn Drumgold in his original murder trial and any subsequent appeals.